

## REMARKS

### 35 U.S.C. 103

Claims 1, 2, and 5-13 have been rejected under 35 U.S.C. 103(a) over Stewart et al. U. S. Patent No. 6,389,460 and Sutcliffe et al. U. S. Patent 6,253,216.

Applicants have previously amended independent claims 1, 5, and 11-13, and claims 2, and 6-10 depend from the amended claims to include the following limitation:

"...said graphics server for serving a document to an edit screen on said display; said graphics server responsive to a user activating an insert graphic command with a cursor positioned at an insertion point for serving to said browser an insert graphics screen for user selection of said graphic effects parameters..."

Herein, applicants amend the independent claims to clarify that the user may select any text in a document for application of graphics.

The above claim language is intended to focus the claims on the concept of allowing the user to select any

text from a displayed document (as distinguished from a graphics input template) and apply graphic attributes to the selected text directly, there being no requirement for the use of a template.

Applicants' graphics server provides the ability to construct an image that is independent from the display medium of the browser. This image is constructed based on (1) the text string, which can be any text string; (2) the font selection; (3) the font color, size, effect (e.g., italics, etc.); (4) text effect to blur or shadow the text string; (5) the background color and/or image; and (6) image effect on the combination of text string and effect with the background image (e.g., button shading, rounding corners). Each of these items can vary independently.

Applicants describe this model in connection with Figures 22-26 at pages 64-68 of their specification as follows, with particularly relevant portions of the specification highlighted to point out the material in support of the distinctions in the currently amended claims with respect to the art.

"Referring to Figure 22, aesthetic support for a web site, such as QuickPlace, is provided as follows. In

step 351, when a user selects QuickPlace, he also selects a theme, which includes set of aesthetic parameters for color, image, fonts type, and other effects. In step 352, the user creates documents which inherit the aesthetic parameters originally selected for this QuickPlace. If at some later time, the user changes the QuickPlace aesthetic parameters, these are propagated to all subsequently created documents. In step 353, the user enters text data for this document, and in step 354 selects 'save'. In response, in step 355 graphics server 350 saves the parameters and text as an image, in step 356 stores the parameters for this image in database 161, and stores the image itself in cache 153 (Figure 3). This is managed by the graphics server 350. This process is particularly useful in an Internet environment, for people who access the QuickPlace can request via an URL parameter string a particular graphic which will be served to them by the graphics server. A graphics server generated image request is used by any user to make an image, and the graphics server responds by checking the cache and if it is found there, serves a saved image from the cache, and if not, generates it anew."

"Referring to Figure 23, a series of panels 360-362 is illustrated showing how a document is published so that it appears as an item 363 in side bar 263 of a QuickPlace display 360. The user selects layout 369 and enters the title in work area 261. The QuickPlace program graphic server 350 puts the title in side bar 263 as a graphic 363, to compliment the aesthetic parameters of the QuickPlace. The user then enters text and selects appearance parameters in work area 261, and these are also generated as graphics which will be displayed in the read area 261 of the saved document."

"Referring to Figure 24, the process for generating a document including inserted graphics is as follows. In step 370, the user is served a document on edit screen 361. In step 371, with the cursor positioned at the point 364 in edit screen 361 where the graphic is to be inserted, the user selects insert graphic text button 367. In step 373, insert graphics screen 362 is presented to the user which includes a text area 261, and buttons and drop down menus for selecting various parameters, including effect, animation, color, size, and so forth. In step 374, when the user selects done

365, edit screen 361 is presented with the image appearing at the selected point 364. In step 375, the user selects publish 368. In response, the editor, which has the URL of the insert graphic text screen 361 that was used to generate the desired graphic, issues a request to graphic server 350 for that URL. The graphic server, in step 376 and responsive to request from the editor, either retrieves the previously generated image of the requested URL, or generates the graphic and serves it to the screen 360 in publish mode."

"In steps 377 and 378, the image created is not saved in the document, but rather in the graphics server URL that generates the image. This is important: an image that is 1x2 inches may be .5 megabytes, and an URL is much less. Depending upon how often the image is used, it may be saved in the cache. Cache is managed by discarding images that are oldest, or some other cache management scheme, and if no longer in cache the image can be regenerated from the parameters stored at the URL...."

"Referring to Figure 25 and Figure 26, graphics server 350 functions as follows. In step 380, the server receives the URL of a graphic request, such as from step 375 (Figure 24). In step 381, the URL string is hashed to obtain a hash number that, in step 382, is used to look for an image in cache with a matching hash number. If, in step 383, that matching image is found, in step 384 the image is served in response to the request. However, if that matching image is not found, the image must be regenerated. In step 385, the URL from the request is parsed to obtain the graphic parameters which, in step 386, are used to construct the graphic server objects, using default parameters for any necessary parameters missing from the URL. Then, for each object constructed in step 386, in step 387 a background object is constructed, in step 388 the font object is constructed, in step 389 the text graphics are made, in step 390 graphic effects from the URL are applied, and in step 391 the background object is combined with the font, text, and effect objects to create the final image. Graphic effects include blurring, shadowing, transparency, etc. If animation is to be applied, in step 392 the number of frames required is determined, and in step 393 the animation effects selected. These include fade in, fade out,

fade in/out, undulation, and slide. Slide includes in, out, loop, up and down. Undulation refers to transition between colors. For animation, a group of still pictures are created in a display sequence. Text is made graphic by creating an image of text and font objects with effects applied. Font objects are parameters that constitute selected font effects, including type, point size, color. A background object is the canvas on which document is painted or created." [Specification, page 64, line 9 to page 68, line 22. Emphasis added.]

On the other hand, the template, from Sutcliffe, indicates a positional placement of graphics, text, etc., in the format of a display "page". Applicants' graphics server has no such template; rather, the image is generated merely on the items specified above and then that image can be placed at the user's discretion anywhere within the document. Once created, the image can be moved to another part of the document. Additionally, this image is created in a standard form and can be manipulated as such outside the confines of the user document.

The Examiner characterized Sutcliffe as teaching the following with respect to the above quoted portion of applicants claims 1, 2 and 5-13:

"In columns 8 and 9, Sutcliffe discloses a "Create or Edit Personal Page" option, which serves a document to an edit screen on the display. As the title suggests, users can create or edit their personal web pages by inserting text, graphics, and backgrounds via a graphical user interface.

Additionally, a "View Page" option allows users to view their web page with the selected graphics parameters. As mentioned, Sutcliffe discloses storing text, graphics, and background parameters, and then using those parameters to reconstruct a personal web page." (Office Action, page 2.)

However, and most significantly, the pertinent part of Sutcliffe also teaches the requirement that the user must start with a template for a personal page, as distinguished from applicants free format page:

"An exemplary method for providing a personal page will now be described by reference to FIG. 4. As shown, the method for providing a personal page may contain many discrete steps. Each of these steps may be manifested to a remote user as a single HTML page which presents the user with options to move to another HTML page or to cause some appropriate action to occur as described herein. It will be appreciated by a person of ordinary skill in the art that the method described in FIG. 4 may be presented to a remote user in other formats without departing from the spirit of the invention described herein."

"A Personal Page Menu 160 may be accessed from a Personals On-line Network ("PON") server 162. The Personal Page Menu 160 may present the page-creating remote user 70 with optional links to the Create or Edit Personal Page 164, Remove Permission 166, Give Permission 168, or View Personal Pages 170 HTML pages. Each of these options leads the remote user to additional pages having the functionality to accomplish the task identified by the titles. Following the Create or Edit Personal Page 164 option, the remote user 70 may be presented with a Choose Template 172 page. The Choose template page 172 presents the remote user 70 with a variety of templates which can provide a graphical layout for the remote user's personal page."

"Referring briefly to FIG. 4A, an exemplary template 188 is shown. A template is a World Wide Web style page design which includes graphics and page layout information. The template may be designed to include a number of fields that may include user entries or selections which personalize the template page. The entries or selections may be made by the user in subsequent steps in the personal page creating method."

"A finite number of templates are provided for selection by a remote user. The templates are stored in an appropriate node of computer network 82 as HTML page descriptions. When a template is selected by a remote user, the system typically stores only a name attribute for the template in the User Information Table 126. The name represents an entry or series of entries in the Template Fields Information Table 134 where the HTML and other descriptions for that template are located. In this manner, the page layout information for each template does not have to be stored for each user who creates a personal page."

"Referring again to FIG. 4, once a template is chosen, the remote user 70 may then be led to a Choose Background 74 page. Here the remote user may be presented with optional selections for color schemes for coloring the personal page. The remote user may also be presented with background graphics which may be selected for display with the personal page. A background attribute may be a name that indicates a pre-stored color scheme for a particular template. Or, a background attribute may be stored as a field for the template as described above."

"After selection of a background by the remote user, the remote user may be presented with a Choose Images 176 page. Here, the remote user may select an image for display on the remote user's personal page from a collection of images previously stored on the Local Computer Network 82, or the remote user may enter or upload an image (Upload Images 178) from the remote user's remote computer 70. Uploaded images may comport with any of the standards known in the art for displaying such images on a computer, including the well-known GIF and JPEG standards. Upon uploading of an image by a remote user, the uploaded image may then appear on that remote user's Choose Images 176 page, and may be chosen by the remote user for inclusion on the personal page. An image attribute, perhaps indicating the name and location of the image file on the local computer network 82, may be stored as a Value 158 in the Personal Page Values Table 152 which corresponds to an image field in the template page. Size limits, both in terms of viewing size and storage size of the image, may be employed to limit the size of uploaded images. Depending upon the template selected, the remote user may be presented with more than one opportunity to select or upload an image."

"Once an image has been selected for display on the personal page, the user may next be presented with an Enter Text 180 page. The Enter Text 180 page may allow the remote user to enter any free form text. The Enter Text 180 page may also present the remote user with questions to answer, or some combination of questions and free form text for display on

the personal page. Text attributes may be stored as text in Value 158 fields in the Personal Page Values Table 152 which corresponds to a text field in the template page. Depending upon the template selected, the remote user may be presented with a series of Enter text 180 pages, or a series of fields for entering text on a single Enter Text 180 page."

"For each selection or entry made by the remote user in the above-described steps, attributes of the selection or entry which describes the remote user designed personal page are stored temporarily until such time as the remote user has finished entering information. This temporary storage may be achieved by a number of methods known in the art. When selection or entry of a template, background, images and text is complete, the remote user may then be presented with an Edit Menu 182 page. The Edit Menu 182 page provides the remote user 70 with options to view the personal page having the remote user selected attributes (e.g. View Page 184), re-edit the personal page, or accept the personal page (Accept Page 186)."

"If the remote user chooses to re-edit the page, the remote user may be provided with a link to the Create or Edit Personal Page 164 page where the remote user may begin anew the process of selecting or entering personal page attributes. Or, the remote user may be provided with links to the Choose Background 174, Choose Images 176, or Enter Text 180 pages for editing only those attributes."

"If the remote user chooses to view the personal page having the attributes selected or entered by the remote user, the personal page is generated "on the fly" and displayed to the remote user. That is, a CGI program is executed that combines the page attributes selected or entered by the remote user and the HTML and other descriptions for the selected template page and displays the resulting graphical page to the remote user in the manner of a World Wide Web page."

"If the remote user chooses to accept the personal page that the remote user has created or edited as shown in step 186, the attributes of that personal page are stored in database 96 on the Local Computer Network 82. That is, upon acceptance of the page by the remote user, the attributes of the personal page are stored in the database system 96 by inserting rows containing the information described above into the User Information Table 126 and Personal Pages Values Table 152." (Sutcliffe, col. 8, line 23 to col. 10, line 14. Emphasis added.)

Thus, as is apparent from the highlighted portion of



the above material from Sutcliffe, Sutcliffe relates to a system and method where the user starts with a graphics template page (as distinguished from a user document), and selects from that template graphics attributes.

Applicants' user document is one where the format is completely up to the user to construct. Sutcliffe's template page dictates a specific form to the page indicating where a graphic item will appear, where a text string will appear, and so forth. In applicants' model, the user has a page body within which to freely add text and graphics, in any format and position desired.

With respect to Stewart, as the Examiner points out, Stewart relates to techniques for storing objects (e.g. images) and retrieving objects from a storage device used as a cache device. There is no teaching in Stewart of providing a system and method for enabling a user to select any text from a displayed document (as distinguished from a template) and apply graphic attributes to it.

Neither Stewart nor Sutcliffe, nor their combination, teach applicants system and method for generating graphic images from user document text and graphic characteristics

associated with that text in the manner now claimed, and which is described in connection with Figures 22-26 at pages 64-68 of their specification.

## SUMMARY AND CONCLUSION


Applicants urge that the above amendments be entered and the case passed to issue with claims 1-2 and 5-13.

If, in the opinion of the Examiner, a telephone conversation with applicant(s) attorney could possibly facilitate prosecution of the case, he may be reached at the number noted below.

Sincerely,

J. Estrada, et al.

By

  
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